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April 15, 2008

United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Independent Asset Management, LLC v. Daniel Zanger (1:07-CV-06431-JSR)

To the Clerk of Court:

We attempted to file this document last night multiple times. Due to a failure with the ECF system, however, we were unable to do so. We gave notice and a copy of the documents to opposing counsel.

Sincerely,

A handwritten signature in black ink, appearing to read "C S Lanza", written in a cursive style.

Craig Stuart Lanza

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**INDEPENDENT ASSET
MANAGEMENT, LLC,**

Plaintiff,

- against -

DANIEL ZANGER,

Defendant.

1:07-CV-06431-JSR

ECF

**DECLARATION OF CRAIG STUART LANZA IN SUPPORT OF
PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT**

I, Craig Stuart Lanza, declare under penalty of perjury pursuant to 28 U.S.C § 1746 as follows:

1. I am an attorney at the law firm Balestriere Lanza PLLC, attorneys for Plaintiff Independent Asset Management, LLC ("Plaintiff"). I submit this declaration to put before the Court true and correct copies of certain documents that are pertinent to Plaintiff's Motion for Summary Judgment.

2. Attached to this declaration, under the identified exhibit tabs, are true and correct copies of the following documents:

Exhibit A	Deposition of Joe Porco, taken on March 3, 2008, at Jones Day.
Exhibit B	Deposition of George Szele, taken on March 5, 2008, at Jones Day.
Exhibit C	Deposition of Daniel Zanger, taken on March 21, 2008, at Balestriere Lanza PLLC.

- Exhibit D Agreement between Independent Asset Management and Daniel Zanger, dated October 19, 2004.
- Exhibit E Prime Broker Agreement between Independent Asset Management, Goldman Sachs Execution & Clearing, L.P., and Daniel Zanger, dated August 5, 2005.
- Exhibit F E-mail communications.
- Exhibit G Instant message communications between George Szele (gbszele) and Daniel Zanger (chartpattern).
- Exhibit H Letter from Butterfield Fund Services (Bermuda) Limited to Independent Asset Management, LLC, dated December 1, 2006

Dated: New York, New York
April 14, 2008

Respectfully submitted,

/s Craig Stuart Lanza
Craig Stuart Lanza (CL-2452)
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document was served on the following counsel of record on April 14, 2008, via the methods listed below:

By ECF and First Class Mail

Thomas H. Sear, Esq.
Jones Day
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/s/ Craig Stuart Lanza
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